



European Rail
Infrastructure Managers



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EIM POSITION PAPER ON THE COMMUNICATION ON A FREIGHT LOGISTICS ACTION PLAN



Rue de la Tourelle 21 - B-1040 Brussels - Tel +32 2 234 37 77 - Fax +32 2 234 37 78 - info@eimrail.org

www.eimrail.org

Communication on a Freight Logistics Action Plan

Introduction:

The European Rail Infrastructure Managers (EIM) welcomes the administrative simplification of freight transport management and operations outlined in the Communication on a Freight Logistics Action Plan. EIM also believe the strong emphasis on information and communication technology will assist in furthering industry improvements.

Freight logistics and freight oriented networks:

- EIM has already commented on the communication on rail freight-oriented networks and on the measures that would dramatically improve interfaces with other transport modes. It generally agrees with the approach of the European Commission.
- In particular, EIM notes that marshalling yards are listed in this very action plan as “strategic locations” needing “adequate transshipment facilities”. Hence, the need to ensure an open and non-discriminatory access of marshalling yards, wherever they may be located (ports, rail terminals etc.).
- EIM appreciates the acknowledgment by the European Commission that freight logistics is primarily an industry issue where the European Commission has a subsidiary role and where it promises to consult thoroughly the sector. This cautious approach will be particularly important for harmonisation measures across modes (establishment of a single transport document, liability and security rules...).
- Mutual recognition of training certificates will be useful to encourage free movement of workers in the transport market.

Items that need further attention in the Freight Logistics Action Plan

EIM would like to draw a particular attention to the following points as they are erroneously or not sufficiently addressed in the European Commission’s Action Plan on Freight Logistics:

- Standards for vehicle weights and dimensions should not be modified (Directive 96/53). The railway sector has clearly demonstrated the dangers of Giga liners and is against a modification of the proposal on Intermodal Loading Units that could allow for their use, even on the ground of optimisation.
- The European Commission should make sure that the multiplication of transport corridors and their management structures does not create unnecessary red tape or confusion for infrastructure managers.
- A further harmonisation of VAT charging across modes and within modes could also be looked at.
- The additional EU funding of green corridors should be granted as early as possible and not wait until 2010.
- Top priority for ITS should be smart charging, which means the internalisation of external costs for all transport modes.

- The Bottleneck exercise lacks direction and needs to develop a clearer focus on priority bottlenecks. EIM has already sent a letter to the European Commission to outline these issues after the first meetings of the Infrastructure Bottlenecks Focal Points.
- Considering the current reality of climate change, EIM believes that indicators recording environmental performances of different transport modes should be developed in priority so that the European Commission can rapidly encourage a switch to cleaner modes.
- EIM welcomes the promise of the European Commission to report on progress made in the implementation of the Action Plan in 2010 but again time is pressing.
- EIM will take part in the consultation of the Urban Transport Green Paper, which will lead to the Urban Transport Action Plan in 2008. It questions already the distinction between the two first actions foreseen in this paper (exchanges of experiences to establish recommendations for urban logistics & benchmarks to measure efficiency and sustainability of delivery and terminals).

Conclusion:

The European Rail Infrastructure Managers (EIM) welcomes the Communication on a Freight Logistics Action Plan, but believes there are some points that need further development. The encouragement and priority of a shift to cleaner transport modes also needs underlining.